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FILED  
SAN MATEO COUNTY

SEP 05 2018  
Clerk of the Superior Court  
By DEPUTY CLERK

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN MATEO

PEOPLE OF THE STATE OF  
CALIFORNIA,

Plaintiff,

v.

JOSHUA G. GAMOS (DOB 3/13/1976)

CARLINA G. GAMOS, aka NORA  
GAMOS (DOB 9/6/1951)

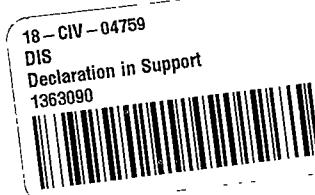
NOEL G. GAMOS (DOB 9/22/1977)

GERLEN B. GAMOS (DOB 1/3/1980),

Defendants.

Case No. 18 CIV 04759

DECLARATION OF SPECIAL AGENT  
PETER WOLD IN SUPPORT OF  
PETITION TO PRESERVE PROPERTY  
AND ASSETS PURSUANT TO PENAL  
CODE SECTION 186.11



EXPERIENCE OF DECLARANT

I, Peter Wold, declare as follows:

I am a duly sworn peace officer currently employed as a Special Agent for the California Department of Justice, Bureau of Investigation, Tax Recovery and Criminal Enforcement Task

1 Force (TRaCE) (hereafter referred as DOJ). I have been a peace officer in California for the past  
2 17 years.

3 From April 2001 through 2012, I was assigned to the DOJ, Bureau of Investigations  
4 (hereafter referred to as BI). While assigned to BI, I conducted investigations into crimes  
5 including, but not limited to, sexual assaults, homicides, human trafficking, grand theft,  
6 embezzlement, perjury, public contract fraud and violent crimes. From February of 2012 through  
7 February of 2015, I was assigned to the DOJ, Bureau of Firearms, where I conducted illegal  
8 firearms investigations and background investigations for Dangerous Weapons Permits.

9 On March 1, 2015, I was assigned to the BI, Tax Recovery and Criminal Enforcement  
10 (TRaCE) Task Force. The mission of the TRaCE Task Force is to investigate elements of the  
11 underground economy engaged in illicit activity and the resulting evasion of business, payroll  
12 and/or income taxes. I have talked to numerous Federal, State, and local law enforcement experts  
13 about specialized investigations involving human trafficking and grand theft (wage theft).

14 **SUMMARY OF INVESTIGATION**

15 On November 13, 2017, I was assigned to investigate the owners of Rainbow Bright, a  
16 residential care facility for adults and day care facilities. At the time I began the investigation, the  
17 owners were identified as Joshua G. Gamos, Carlina G. Gamos (AKA Nora Gamos), Felicimo  
18 Gamos, and Noel G. Gamos. Later in the investigation, I determined there was an additional  
19 suspect to include, Gerlen B. Gamos. Joshua G. Gamos, Carlina G. Gamos, Noel G. Gamos, and  
20 Gerlen B. Gamos will hereafter be referred to as Defendants.

21 Over the course of the investigation, I identified vulnerable victims within the Filipino  
22 community, who were often undocumented, and who Defendants enslaved to work at their  
23 facilities and personal homes, without paying them adequate wages for the long hours they  
24 worked. I learned Defendants failed to pay the victims in excess of \$5 million in wages from  
25 2009 through 2014. I also learned from 2015 to 2017, Defendants continued to fail to pay their  
26 employees adequate wages, despite the Department of Labor's investigation and requirement they  
27 do so. Specifically, Defendants failed to pay their employees during this time period in excess of  
28 \$3 million.

1        Additionally, in some instances, certain Defendants forced some of the undocumented  
2        victims to work twenty-four hours per day, seven days per week, while Defendants withheld their  
3        passports. Moreover, Defendant Joshua Gamos used force, violence, and duress with a younger  
4        female employee by requiring her to perform sexual acts to him upon his demand. During the  
5        course of the investigation, I also learned Defendants failed to report in excess of \$2 million to  
6        the California Employment Development Department (EDD) and failed to maintain worker's  
7        compensation insurance for their employees.

## **DETAILS OF INVESTIGATION**

Prior to beginning my investigation on November 13, 2017, I learned the United States Department of Labor (DOL), had initiated an investigation in October 2014 after receiving complaints from Rainbow Bright employees that the owners of these facilities forced employees to work long hours without adequate pay, proper living conditions, and worker's compensation insurance. DOL referred their initial investigation to the San Mateo County District Attorney's Office (SMCDA).

I am informed and believe that the SMCDA requested that the EDD to assist in investigating whether the Rainbow Bright owners committed unemployment insurance fraud and payroll tax evasion. During the EDD investigation, I am informed and believe that auditors reviewed EDD records, Rainbow Bright bank statements and checks, DOL interviews, California Department of Social Services documents, and 1099s. I am informed and believe that an EDD auditor determined Rainbow Bright underreported employees and wages paid to employees from July 1, 2008 to September 30, 2017. The auditor located numerous workers Rainbow Bright did not report to EDD. These workers provided services as drivers, caregivers, and maintenance workers. The EDD audit determined a total of \$2,436,504.09 in employee wages that were not reported to EDD from the third quarter of 2008 through the third quarter of 2017.

25 While DOL, EDD, and SMCDA investigated Defendants for grand theft (wage theft), tax  
26 violations, and worker's compensation fraud, the agencies believed that some of the employees  
27 may have been physically and sexually assaulted by certain Defendants. It is at this point, that I  
28 took over the investigation and I began to interview former employees who worked for Rainbow

1 Bright. I learned through these interviews that Defendants forced some of their undocumented  
2 employees to work twenty-four hours per day, seven days per week, while holding their  
3 passports. Employees told me Defendants required that they work long hours without breaks,  
4 sleep on cold floors and in cold garages, wait outside in the rain when Defendants were away, and  
5 also that Defendants prohibited them from freely leaving the facilities. Employees told me  
6 Defendants prohibited them from talking on the telephone to friends or family and also demanded  
7 that the employees not talk to other employees. I learned from employees that Defendant Joshua  
8 Gamos and Defendant Carlina Gamos regularly threatened employees that if they tried to leave,  
9 or if they stopped working at their facilities or personal homes, United States immigration agents  
10 would arrest the employees and deport them. Numerous employees that I interviewed told me  
11 they feared for their safety and that Defendants instilled fear in them that they may be arrested  
12 and deported if they did not comply with Defendants instruction.

13 I interviewed two victims who were hired as personal house servants for Defendant  
14 Joshua Gamos and his family, and Defendants Noel and Gerlen Gamos. The two elderly victims  
15 I interviewed began to work for Defendants in January 2014, which was within approximately  
16 one month of the victims arriving to the United States from the Philippines. The fifty-nine-year-  
17 old victim, who worked for Defendant Joshua Gamos, described occasions where Defendant  
18 Joshua Gamos physically and verbally abused her. Defendants Noel and Gerlen Gamos  
19 employed the above victim's sister as their personal house servant. This elderly victim described  
20 harsh working conditions while she worked for Noel and Gerlen Gamos. She told me she had  
21 only a few days off in the almost 12 months she worked for them, and that Defendants Carlina,  
22 Noel, and Gerlen Gamos did not allow her to talk to her sister while she worked for them even  
23 when the two were in the same room.

24 I interviewed a long term employee with Rainbow Bright. She began working for  
25 Defendants shortly after arriving to the United States from the Philippines. She was just 21 years-  
26 old. She told me that she worked as a caregiver at various Rainbow Bright facilities. Similar to  
27 other employees, she described a similar pattern of labor trafficking that Defendants had engaged  
28 in with other employees. She told me that Defendants knew she did not have proper immigration

1 documents to allow her to stay permanently in the United States. She also described how  
2 Defendant Joshua Gamos initiated a personal relationship with her. She described how it did not  
3 take long before the relationship with Joshua Gamos turned violent. She described numerous acts  
4 of sexual intercourse where Joshua Gamos used physical violence and duress to accomplish these  
5 acts; leaving bruises on her body.

6 I interviewed numerous other victims who were employed by Defendants and treated  
7 poorly by Defendants. Other victims described conditions where Defendants enslaved them to  
8 work twenty-four hours per day, seven days per week at the facilities and their personal homes,  
9 without adequate pay and living conditions.

10 I am informed and believe by SMCDA Inspector Zemlok that Rainbow Bright did not  
11 maintain proper workers' compensation insurance for their employees as well. Several Rainbow  
12 Bright employees reported throughout this investigation that they were injured while working at  
13 Rainbow Bright. These employees reported their work injuries to Defendant Joshua Gamos; he  
14 told some of the workers to deny the injuries were work-related and instructed them to tell the  
15 emergency room doctors a lie about how they received their injuries. Defendant Joshua Gamos  
16 did not pay for the workers' medical bills, and instead required the workers to pay for their own  
17 medical bills for work related injuries.

18 On September 5, 2018, the People filed criminal case 18SF010634 in San Mateo  
19 County Superior Court. The complaint alleges eight counts of human trafficking, in violation of  
20 Penal Code section 236.1(a), twenty-six counts of grand theft (wage theft), in violation of Penal  
21 Code section 487(a), a count of workers' compensation fraud, in violation of Insurance Code  
22 section 118880(a), nine counts of willful failure to file tax return, in violation of Unemployment  
23 Insurance Code section 2117.5, and nine counts of willful failure to collect or pay taxes, in  
24 violation of Unemployment Insurance Code section 2118.5, and conspiracy to commit human  
25 trafficking and grand theft (wage theft), all felonies. It is specially alleged that Defendants Joshua  
26 Gamos, Carlina Gamos, Noel Gamos, and Gerlen Gamos committed two or more related felonies,  
27 a material element being fraud or embezzlement with a loss of more than \$500,000 in violation of  
28 Penal Code section 186.11 (a)(2).

At lease two of the charges contain a material element of which is fraud or embezzlement. The charges all stem from Defendants fraudulent conduct directed at the employees Defendants employed to work at their residential adult care facilities and day care facilities; conduct which involves a pattern of related felony conduct. Further the criminal enterprise perpetrated by Defendants resulted in a taking in excess of \$5 million from victims employed from 2009 to 2014, and unreported employment wages to EDD in excess of \$2 million.

#### DEFENDANTS' ASSETS AND PROPERTIES

Based upon the investigation, I believe that the assets and title to the property listed below are currently owned, held by, or under the control of Defendants. I became aware of Defendants assets through the EDD investigation, SMCDA's investigation, and my own research. On or about July 23, 2018, I conducted research by accessing law enforcement and public information databases to obtain information on deeds, properties, and ownership. I also accessed online records through the San Mateo County Recorder's Office. Also, SMCDA inspectors and CA DOJ agents conducted surveillances on the properties listed below to assist in location determination and ownership information. Based on these searches and surveillances, I confirmed ownership of the 6 real properties located below:

#### REAL PROPERTY:

626 Skyline Drive, Daly City, CA 94015  
Owner: Elaine Saclolo (Gamos) (spouse of Joshua Gamos)  
Parcel No.: 008164010 (San Mateo County)  
Estimated value: \$ 700,000

27 Alisal Court, Pacifica, CA 94044  
Owner: Noel Gamos  
Parcel No.: 009560640 (San Mateo County)  
Estimated value: \$ 796,282

251 Del Prado Drive, Daly City, CA 94015  
Owner: Joshua Gamos, Carlina Gamos  
Parcel No.: 008301490  
Estimated value: \$ 950,000

2585 Wexford Avenue, South San Francisco, CA 94080  
Owner: Joshua Gamos, Carlina Gamos  
Parcel No.: 091082930  
Estimated value: \$ 940,000

1                   104 Westmoor Avenue, Daly City, CA 94015  
2                   Owner: Noel Gamos  
3                   Parcel No.: 008045220  
4                   Estimated value: \$ 920,000

5                   40 Sugar Hill Drive, Hillsborough, CA 94010  
6                   Owner: Joshua Gamos  
7                   Parcel No.: 038343030  
8                   Estimated value: \$ 3,947,400

9                   Additionally, I am informed and believe the EDD, through the execution of search  
10                  warrants, identified some of the bank accounts belonging to Defendants, which the EDD shared  
11                  with me to include in my investigation. Based upon this investigation, below I have identified the  
12                  bank accounts in the names of Defendants Joshua Gamos, Noel Gamos, and Carlina Gamos:

13                  BANK ACCOUNTS:

14                  Bank of America  
15                  Account#: XXXXX3349  
16                  Account name: Rainbow Bright ARF; Joshua G Gamos, Noel G  
17                  Gamos, Felicisimo Gamos  
18                  Estimated value: \$35,782.96 as of July 31, 2017

19                  Bank of America  
20                  Account #: XXXXX2030  
21                  Account name: Joshua G Gamos, Noel G Gamos, Felicisimo  
22                  Gamos  
23                  Estimated value: \$143.07 as of July 31, 2017

24                  Bank of America  
25                  Account #: XXXXX6292  
26                  Account name: Joshua G Gamos, Noel G Gamos, Felicisimo  
27                  Gamos  
28                  Estimated value: \$ 2107.09 as of July 31, 2017

29                  Bank of America  
30                  Account#: XXXXX0647  
31                  Account name: Noel G. Gamos  
32                  Estimated value: \$ 40,569.29 as of August 16, 2017

33                  Bank of America  
34                  Account#: XXXXX0931  
35                  Account name: Rainbow Bright Preschool/Infant Daycare; Noel G.  
36                  Gamos  
37                  Estimated value: \$8,416.53 as of July 31, 2017

38                  Bank of America  
39                  Account#: XXXXX7867  
40                  Account name: Rainbow Bright Preschool Infant Daycare; Carlina  
41                  G. Gamos  
42                  Estimated value: \$ 664.67 as of July 31, 2017

1 Bank of America  
2 Account#: XXXXX4809  
3 Account name: Felicisimo Gamos, Carlina G. Gamos, Noel G.  
Gamos  
Estimated value: \$78,190.40 as of July 25, 2017

4 Bank of America  
5 Account #: XXXXX4786  
6 Account name: Felicisimo Gamos, Carlina G. Gamos, Noel G.  
Gamos  
Estimated value: \$ 0.00 as of July 25, 2017

7 Bank of America  
8 Account #: XXXXX9689  
9 Account name: Noel G. Gamos  
Estimated value: \$ 25.00 as of July 14, 2017

10 Bank of America  
11 Account #: XXXXX6901  
12 Account name: Carlina G. Gamos International Preschool; Carlina  
G. Gamos  
Estimated value: \$ 27.86 as of July 14, 2017

13 Bank of America  
14 Account #: XXXXX5553  
15 Account name: Carlina G. Gamos  
Estimated value: \$0.00 as of May 16, 2016

16 During interviews I conducted, along with interviews the SMCDA and DOL conducted,  
17 victims stated Defendant Joshua Gamos had numerous vehicles, many of which the employees  
18 were tasked with maintaining and detailing on a regular basis. I requested, reviewed, and  
19 confirmed this by reviewing California Department of Motor Vehicle records. I also reviewed  
20 online computations from Kelly Blue Book, Car Guru.com, and Cycle Trader.com to determine  
21 the approximate value of the vehicles. To determine the values of the vehicles, I used the basic  
22 vehicle package option for the vehicle make and model (if I had model information), calculated  
23 mileage at 12,000 per year in vehicle mileage, if mileage was unknown to me, and noted vehicle  
24 condition as fair. Based on this, I believe Defendant Joshua Gamos owns, or has an ownership  
25 interest in, approximately thirty vehicles. I believe Defendant Noel Gamos owns, or has an  
26 ownership interest in, approximately six vehicles. I believe Defendant Carlina Gamos owns, or  
27 has an ownership interest in, at least one vehicle. The information on these vehicles is detailed  
below:

1      MOTOR VEHICLES:

2      1993 Honda: 4 door  
3      CA License #: 3CKC000  
4      Vin #: XXXXXXXXXXXXXXX1685  
5      Registered Owner: Joshua Gamos  
6      Estimated value: \$ 258

7      1999 Honda Odyssey  
8      CA License #: 4HGU781  
9      Vin #: XXXXXXXXXXXXXXX5147  
10     Registered Owner: Joshua Gamos  
11     Estimated value: \$ 380

12     1999 Acura TL  
13     CA License #: 6YQE790  
14     Vin #: XXXXXXXXXXXXXXX4034  
15     Registered Owner: Joshua Gamos  
16     Estimated value: \$ 562

17     2000 Ferrari 360 Modena  
18     CA License #: JG36OF  
19     Vin #: XXXXXXXXXXXXXXX7604  
20     Registered Owner: Joshua Gamos  
21     Estimated value: \$ 73,980

22     2001 BMW  
23     CA License #: 4TTA076  
24     Vin #: XXXXXXXXXXXXXXX2191  
25     Registered Owner: Joshua Gamos, Carlina Gamos  
26     Estimated value: \$371

27     2002 Toyota  
28     CA License #: JGAMOS  
29     Vin #: XXXXXXXXXXXXXXX0633  
30     Registered Owner: Joshua Gamos  
31     Estimated value: \$ 489

32     2003 Toyota Truck  
33     CA License #: JGAMOS1  
34     Vin #: XXXXXXXXXXXXXXX3161  
35     Registered Owner: Joshua Gamos  
36     Estimated value: \$ 2,106

37     2005 BBCHP Chopper  
38     CA License #: 18B7135  
39     Vin #: XXXXXXXXXXXXXXX1807  
40     Registered Owner: Joshua Gamos  
41     Estimated value: \$ 12,000

42     2005 Chrysler Van  
43     CA License #: 7YZP852  
44     Vin #: XXXXXXXXXXXXXXX5702  
45     Registered Owner: Joshua Gamos  
46     Estimated value: \$ 206

1                   2006 Toyota Matrix  
2                   CA License #: 5SGE760  
3                   Vin #: XXXXXXXXXXXXXXXX7659  
4                   Registered Owner: Joshua Gamos  
5                   Estimated value: \$2,315

6                   2007 Honda 4 Civic  
7                   CA License #: 5ZQV534  
8                   Vin #: XXXXXXXXXXXXXXXX4590  
9                   Registered Owner: Joshua Gamos  
10                  Estimated value: \$ 1,530

11                  2007 Ford Van  
12                  CA License #: 7LOW018  
13                  Vin #: XXXXXXXXXXXXXXXX0868  
14                  Registered Owner: Joshua Gamos  
15                  Estimated value: \$2,658

16                  2008 Ford Econoline E 350  
17                  CA License #: 6DIF254  
18                  Vin #: XXXXXXXXXXXXXXXX3031  
19                  Registered Owner: Joshua Gamos  
20                  Estimated value: \$3,714

21                  2009 Ford Van  
22                  CA License #: 8Y11466  
23                  Vin #: XXXXXXXXXXXXXXXX0859  
24                  Registered Owner: Joshua Gamos  
25                  Estimated value: \$ 4,677

26                  2009 Audi Q7  
27                  CA License #: 6FRX483  
28                  Vin #: XXXXXXXXXXXXXXXX7381  
29                  Registered Owner: Joshua Gamos, Elaine Gamos  
30                  Estimated value: \$ 8,747

31                  2010 Ford Van  
32                  CA License #: 7KED383  
33                  Vin #: XXXXXXXXXXXXXXXX9183  
34                  Registered Owner: Joshua Gamos  
35                  Estimated value: \$ 6,219

36                  2011 Ford Van  
37                  CA License #: 6NZK249  
38                  Vin #: XXXXXXXXXXXXXXXX1376  
39                  Registered Owner: Joshua Gamos  
40                  Estimated value: \$ 6,716

41                  2012 Nissan GT-R  
42                  CA License #: 6SPA410  
43                  Vin #: XXXXXXXXXXXXXXXX0773  
44                  Registered Owner: Joshua Gamos  
45                  Estimated value: \$ 63,999

1                   2012 Ford Econoline E 350  
2                   CA License #: 7KNG464  
3                   Vin #: XXXXXXXXXXXXXXXX7394  
4                   Registered Owner: Joshua Gamos  
5                   Estimated value: \$ 11,109

6                   2013 Jeep utility vehicle  
7                   CA License #: JGAMOS3  
8                   Vin #: XXXXXXXXXXXXXXXX6466  
9                   Registered Owner: Joshua Gamos  
10                  Estimated value: \$ 7, 236

11                  2013 Ford Van  
12                  CA License #: 7AKS940  
13                  Vin #: XXXXXXXXXXXXXXXX0454  
14                  Registered Owner: Joshua Gamos  
15                  Estimated value: \$ 8,729

16                  2014 Lamborghini Aventador  
17                  CA License #: 7KEF060  
18                  Vin #: XXXXXXXXXXXXXXXX2709  
19                  Registered Owner: Joshua Gamos  
20                  Estimated value: \$ 339,000

21                  2015 Toyota Corolla  
22                  CA License #: 7MMW357  
23                  Vin #: XXXXXXXXXXXXXXXX4644  
24                  Registered Owner: Joshua Gamos  
25                  Estimated value: \$ 10,078

26                  2015 Subaru 4 door  
27                  CA License #: 7MZA781  
28                  Vin #: XXXXXXXXXXXXXXXX0480  
29                  Registered Owner: Joshua Gamos  
30                  Estimated value: \$ 13,744

31                  2016 Ford Transit 150 XLT  
32                  CA License #: 80030A2  
33                  Vin #: XXXXXXXXXXXXXXXX8002  
34                  Registered Owner: Joshua Gamos  
35                  Estimated value: \$ 18,304

36                  2016 Chevrolet 2 door  
37                  CA License #: 7UBC544  
38                  Vin #: XXXXXXXXXXXXXXXX0988  
39                  Registered Owner: Joshua Gamos  
40                  Estimated value: \$ 9,839

41                  2016 Toyota Landcruiser  
42                  CA License #: 7UCM405  
43                  Vin #: XXXXXXXXXXXXXXXX0302  
44                  Registered Owner: Joshua Gamos  
45                  Estimated value: \$ 52,839

1                   2016 Chevrolet  
2                   CA License #: JGZO6  
3                   Vin #: XXXXXXXXXXXXXXXX0988  
4                   Registered Owner: Joshua Gamos  
5                   Estimated value: \$ 9,839

6                   2017 Ford Coupe  
7                   CA License #: 8CKH631  
8                   Vin #: XXXXXXXXXXXXXXXX5580  
9                   Registered Owner: Joshua Gamos  
10                  Estimated value: \$ 7,072

11                  2003 BMW M3  
12                  CA License #: D108V0  
13                  Vin #: XXXXXXXXXXXXXXXX3029  
14                  Registered Owner: Noel Gamos  
15                  Estimated value: \$ 9,508

16                  2004 Mercedes  
17                  CA License #: 5FFN357  
18                  Vin #: XXXXXXXXXXXXXXXX3007  
19                  Registered Owner: Noel Gamos  
20                  Estimated value: \$ 758

21                  2008 Mercedes  
22                  CA License #: D110V0  
23                  Vin #: XXXXXXXXXXXXXXXX8060  
24                  Registered Owner: Noel Gamos  
25                  Estimated value: \$ 3,854

26                  2009 Lexus LS600hL  
27                  CA License #: F583T0  
28                  Vin #: XXXXXXXXXXXXXXXX9811  
29                  Registered Owner: Noel Gamos  
30                  Estimated value: \$ 18,333

31                  2011 Honda Pilot  
32                  CA License #: E547T0  
33                  Vin #: XXXXXXXXXXXXXXXX5122  
34                  Registered Owner: Noel Gamos  
35                  Estimated value: \$ 9,754

36                  2013 Toyota Tacoma  
37                  CA License #: 157USS  
38                  Vin #: XXXXXXXXXXXXXXXX5425  
39                  Registered Owner: Noel Gamos  
40                  Estimated value: \$ 15,912

41                  The total value of the assets listed above is \$9,624,473 for real property and the vehicles.  
42                  Furthermore, the value of the bank accounts for DEFENDANTS collectively in July to August  
43

